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Attorneys for Defendant, TRIAD FAMILY
SERVICES

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

J. P., by and through his Guardian ad
Litem, SHANNON VILLANUEVA

Plaintiffs,

v.

COUNTY OF ALAMEDA, DIANE
DAVIS MAAS, SUE MAY, TRIAD
FAMILY SERVICES, MARIA REFUGIO
MOORE, and DOES 1-30, inclusive,

Defendants.

Case No. 4:17-cv-05679-YGR (SK)

**DECLARATION OF NANCY REAGH IN
SUPPORT OF DEFENDANT TRIAD
FAMILY SERVICES' MEMORANDUM
OF POINTS AND AUTHORITIES IN
SUPPORT OF MOTION FOR SUMMARY
JUDGMENT, OR, IN THE ALTERNATIVE,
PARTIAL SUMMARY JUDGMENT**

Date: June 18, 2019

Time: 2:00 p.m.

Place: Courtroom 1 – 4th Floor, Oakland
Courthouse, 1301 Clay Street,
Oakland, CA

Judge: Hon. Yvonne Gonzalez Rogers

Complaint filed: October 2, 2017

Trial Date: April 29, 2019

I, Nancy Reagh, declare as follows:

1. From January 2015 through the present I have been employed as the currently the Chief Executive Officer (CEO) of Triad Family Services ("Triad"). In my position as CEO, I oversee all operations of the agency. I have worked for Triad for the last twelve years. My first position with Triad was as a Social Worker. I then became a Director and then Triad's CEO. I

1 have worked for foster family agencies for 25 years. I am very knowledgeable regarding the duties
2 and responsibilities of foster family agencies when counties contract with foster family agencies to
3 place foster children in foster homes certified by foster family agencies. I am knowledgeable
4 regarding the facts and circumstances of The County of Alameda's contract with Triad for the
5 placement of plaintiff J.P. and his sister M.M. in the Triad-certified foster home operated by Maria
6 Moore from October 1 through October 16, 2015. I am knowledgeable regarding the duties of
7 Triad pertaining to the monitoring and oversight of the placement of plaintiff J.P. and his sister
8 M.M. in the Triad-certified foster home operated by Maria Moore from October 1 through October
9 16, 2015. This declaration is based upon my personal knowledge. If called as a witness, I could
10 and would competently testify under oath to the facts stated herein.

12 2. Triad Family Services is an Internal Revenue Code section 501(c)(3) California
13 nonprofit public benefit corporation. Triad has been a foster family agency since 1988, and is
14 licensed by the State of California, through the Department of Social Services.

16 3. Triad Family Services has at all times referenced in plaintiff's First Amended
17 Complaint been a foster family agency, licensed by the State of California Department of Social
18 Services, and it is subject to the compliance and enforcement authority of the Community Care
19 Licensing Division of the Department of Social Services of the State of California, and Triad is
20 subject to the regulations in California Code of Regulations, Title 22, Division 6, Chapter 8.8 and
21 subject to the provisions of California Community Care Facilities Act (Health & Safety Code
22 sections 1501-1558.3) which pertain to foster family agencies. In 2015, Triad had foster family
23 offices in Lathrop, Oakland and Sacramento.

25 4. Counties, including County of Alameda, contact Triad Family Services for
26 placement of children in homes that are certified by Triad Family Services. Triad proposes one or
27 more certified foster homes to the county seeking the placement of children, and the county then
28 either approves of or rejects the certified foster home(s).

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1 5. On or about September 9, 2015, Triad certified the Maria Moore foster family home
 2 and notified the Community Care Licensing Division of the State of California Department of
 3 Social Services of said certification.

4 6. As Triad's CEO, I am knowledgeable regarding the job responsibilities of Triad's social
 5 workers and how they should fulfill their responsibilities. The responsibilities of Triad's social
 6 workers regarding the certification of foster family homes and the monitoring of and provision of
 7 services to children who are placed in foster homes which Triad has certified, are set forth at Health
 8 & Safety Code section 1502(4) and at California Code of Regulations, Title 22, Division 6, Chapter
 9 8.8, the provisions of California Community Care Facilities Act (Health & Safety Code sections
 10 1501-1558.3) which pertain to foster family agencies and, in this case, in the placement agreement
 11 between Triad and The County of Alameda.
 12

13 I declare under the penalty of perjury under the laws of the State of California that the
 14 foregoing is true and correct.
 15

16 Dated: April 5, 2019

17
 18 
 19 Nancy Reagh